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PRE-APPEAL BRIEF REQUEST FOR REVIEW		Docket Number (Optional) 200047.00007	
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	First Named Inventor Gregory M. Shreve		
	Art Unit 2626	Examiner Pierre, M.	
<p>Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request.</p> <p>This request is being filed with a notice of appeal.</p> <p>The review is requested for the reason(s) stated on the attached sheet(s). Note: No more than five (5) pages may be provided.</p> <div style="display: flex; justify-content: space-between; align-items: flex-start; margin-top: 20px;"><div style="width: 45%;"><p>I am the</p><div style="margin-bottom: 10px;"><input type="checkbox"/> applicant/inventor.</div><div style="margin-bottom: 10px;"><input type="checkbox"/> assignee of record of the entire interest. See 37 CFR 3.71. Statement under 37 CFR 3.73(b) is enclosed. (Form PTO/SB/96)</div><div style="margin-bottom: 10px;"><input checked="" type="checkbox"/> attorney or agent of record. Registration number <u>32712</u></div><div><input type="checkbox"/> attorney or agent acting under 37 CFR 1.34. Registration number if acting under 37 CFR 1.34 _____</div></div><div style="width: 50%; text-align: center;"> _____ Signature <u>Scott M. Oldham</u> Typed or printed name <u>(330) 864-5550</u> Telephone number <u>September 5, 2006</u> Date</div></div> <p>NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required. Submit multiple forms if more than one signature is required, see below*.</p>			
<div style="display: flex; align-items: center;"><input type="checkbox"/> *Total of <u>1</u> forms are submitted.</div>			

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**Applicant:** Shreve**Examiner:** Pierre, M.**Serial No.:** 10/073,516**Art Unit:** 2626**Filed:** 2/11/02**For:** *Process for the Document Management and Computer-Assisted Translation of Documents Utilizing Document Corpora Constructed by Intelligent Agents***ARGUMENTS ACCOMPANYING PRE-APPEAL BRIEF REQUEST FOR REVIEW**

Claims 1-38 and 47-60 are currently pending in the application. In the Final Office Action, the Examiner continues to reject claims 1-3, 18-27, 29-38 and 48-60 under 35 USC 102(b) as being anticipated by Fritz et al. With respect to these claims, the Examiner has failed to account for the express limitations of the claimed invention, which clearly distinguish from Fritz. Fritz describes a document management and storage system with various features that allow for the aggregation of different physical and content versions of documents and their association with logical objects. The system of Fritz is a multi-user version control system. Fritz does not deal in any substantive way with the aspects of the present invention, including:

- analysis of a document collection (corpus) for the purposes of discovering and tagging internal document features and structures;
- use of analysis to build models of a document collection for the purposes of creating parameters that can be used by intelligent agents to enhance (expand) the corpus for specific purposes, such as translation;
- use of modeling techniques to identify corpus enhancement parameters;
- use of corpus enhancement parameters to program an intelligent agent to search external repositories; and other claimed limitations of the present invention.

With respect to claim 1, the Examiner states that Fritz teaches a method including the steps of gathering a source corpus of documents in electronic form with reference to elements

104 and 106. With reference to Fig. 1 of Fritz, elements 104 and 106 relate to a process for the “checking in/out” of a single physical object (file) for the purpose of editing or viewing based upon access controls defined in the IR Administration Data. The IR Administration Data provides controls that lock the file to prevent simultaneous access and assures that all changes to the file are incorporated before allowing another user to access the file. Thus, the locking of the file eliminates the inadvertent overwriting of the file that might occur if multiple users simultaneously attempted to edit the file. The elements 104 and 106 and teaching associated therewith simply do not relate to the present invention which claims gathering a source corpus of documents used in the further steps of the method. This step of gathering a source corpus of documents simply is not reflected in Fritz in any manner.

The Examiner also suggests that Fritz uses a meta-language to electronically tag the source corpus as claimed in claim 1, with reference to Fig. 3 element 304, “language” and “version” and “attributes”, which are stated to electronically tag the source corpus. The Examiner states that the meta-information is language captured from an editor with which the object was created or generated by the information repository, with reference to Fig. 3 element 306 and column 6 lines 16-20. This is stated to teach that logical objects contain language descriptions of all documents. In claim 1 of the present invention, the claimed step of using a meta-language to electronically tag the source corpus relates to using a meta-language to describe domain content (terminology) and document structure which previously did not exist. The reference to using a meta-language in the teachings of Fritz does not relate to this aspect of the invention, wherein the source corpus is tagged for the subsequent action by an intelligent agent to enhance the source corpus according to the present invention. This step of using a meta-language to tag the source corpus must be read in conjunction with other steps of the method, and again defines a distinct step from the teachings of Fritz.

Further, the steps of modeling the source corpus, such as in terms of document and domain structure information, to identify corpus enhancement parameters as in claim 1, has no correlation within the prior art of Fritz. The Examiner references Fig. 3 element 306, stating it is enhancement of element 304 with regard to this step of the method. Figure 3 elements 304 and 306 of Fritz illustrate that physical objects (files) held within Fritz’s information repository use

meta-language as descriptors of those physical objects (files). Such descriptors are applied to the physical object and are used purely for informational purposes to distinguish multiple versions of the physical object such that when a client viewing application makes a request of the logical object, the proper physical object can be displayed according to the metadata settings of the viewer application. For example, if within the Fritz information repository there exists the generic logical object "Owners Manual" and the physical objects "English Owners Manual", "French Owners Manual", "Spanish Owners Manual", and "Italian Owners Manual", then should a client select the link to the generic logical object "Owners Manual", the internal language setting of the viewer application will tell the information repository which physical object to display, based upon the language preference setting within the viewer application. No modeling of the document is conducted since, as the name implies, the "physical object" physically exists as an electronic file within the information repository. The reliance upon Fig. 3 elements 304 and 306 with regard to the step of modeling the source corpus as set forth in claim 1 simply has no correlation within the prior art of Fritz.

The Examiner also states that Fritz programs the corpus enhancement parameters into an intelligent agent as set forth in claim 1 of the present invention, with reference to a three tiered IR, information repository, content model and IR document management agent/system as set forth in Fig. 1 element 108 and column 6 lines 42-55 of Fritz. As the prior art of Fritz does not model a source corpus to identify corpus enhancement parameters as previously mentioned, it cannot and does not program the corpus enhancement parameters into an intelligent agent as set forth in claim 1 of the present invention. Element 108 as shown in Fig. 1 of Fritz relates to the use of a quasi-intelligent agent designed for access control, and simply does not relate in any manner to programming the identified corpus enhancement parameters into an intelligent agent and using the intelligent agent to search external repositories as set forth in the present invention. In the claimed invention, the meta-information is used to create parameters derived from the original collection of documents that are programmed into an intelligent agent, which then seeks similar terms and structures in an external repository to import the results of the search back into the original collection to create an enhanced unicorpus. These aspects of the claimed invention have no correlation in Fritz. Therefore, it is respectfully submitted that independent claim 1 is

not anticipated by nor in any way made obvious in view of Fritz, and this claim as well as those claims that depend either directly or indirectly from claim 1 define allowable subject matter.

Similarly, it is respectfully submitted that Fritz et al. does not teach or suggest the invention of independent claim 20. As stated above in the response to the rejection of claim 1, Fritz merely describes an access control methodology and a method of physical object resolution. No modeling of a source corpus is performed as in claim 20. Further, nothing within Fritz relates to providing search parameters to an intelligent agent and enhancing the source corpus by accessing resources outside of the source corpus with the intelligent agent as set forth in claim 20. The further step of replicating the first uni-corpus in at least one other language to form a second uni-corpus is similarly not taught in any way by the prior art of Fritz. Figures 3 and 4 of Fritz are not relevant to this limitation. Fritz does not describe in any way the replication of a corpus or information repository across language. Therefore, it is respectfully submitted that independent claim 20 and those claims that depend either directly or indirectly from claim 20 define allowable subject matter.

Independent claim 30 also clearly distinguishes from Fritz for similar reasons and this claim as well as those claims dependent thereon should be in allowable form. The claimed invention provides modeling of the source corpus and deriving parameters for the operation of an intelligent agent over external document repositories. The source corpus is enhanced as claimed by documents retrieved by the intelligent agent. Such a process is not taught or suggested in any way by Fritz. Furthermore, in view of at least the foregoing, the similar nature of independent claims 48, 50, 51, 52, 57, 59, and 60 to the previous discussions herein, and also due to the fact that Fritz does not teach or suggest the claimed elements of the invention as set forth in these claims, it is respectfully submitted that independent claims 48, 50, 51, 52, 57, 59, and 60 and those claims dependent thereon define allowable subject matter.

The Examiner has also rejected claims 4-17 and 28 under 35 U.S.C. 103(a) as being unpatentable over Fritz et al. (U.S. Patent 6,134,552) in view of Morimoto et al. (US 6,789,057). As described previously herein, independent claims 1 and 20 are not anticipated by Fritz. Also, the combination of Fritz and Morimoto et al. (US 6,789,057), hereinafter Morimoto, does not teach or suggest the invention claimed in these claims. Morimoto describes a dictionary-based

machine translation system with morphological and syntactic components operating over a network. The claimed invention is not concerned with a dictionary-based system, nor is the claimed invention concerned with a free-standing machine translation system. The claimed invention offers a mechanism to create special-purpose document collections that can then be enhanced for supporting computer-assisted translation. Morimoto does not address the deficiencies of Fritz as previously described. It is respectfully submitted that it would not have been obvious to one of ordinary skill in the art to modify Fritz on the basis of Morimoto and produce the system of the claimed invention.

The Examiner also rejects claim 47 is rejected under 35 U.S.C. 103(a) as being unpatentable over Fritz et al. (U.S. Patent 6,134,552) in view of Hartrick et al. (US 5,532,920). It is respectfully submitted that neither Fritz, Hartrick et al. (US 5,532,920), hereinafter Hartrick, nor the combination thereof teach or suggest the invention of independent claim 47 for at least the same reasons as given above for claims 1, 20, and 30. Applicants believe that the systems described by Fritz have very little resemblance in purpose, structure, or function to the claimed invention for reasons previously presented herein. Furthermore, Hartrick is concerned with royalty payments that are agreed to be made before copying a book. However, Hartrick is not at all concerned with accessing a source corpus with an intelligent agent to analyze the source corpus as is the claimed invention.

Accordingly, the applicant respectfully requests reconsideration of the rejections and objections based on at least the foregoing. After such reconsideration, it is urged that allowance of all pending claims will be in order.

Respectfully submitted,



Scott M. Oldham
Registration No. 32,712

Hahn Loeser & Parks LLP
One GOJO Plaza, Suite 300
Akron, OH 44311-1076 (330) 864-5550 Fax 330-864-7986